

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes
	)	
_____	)	

**NOTICE OF MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY & OPPORTUNITY TO OBJECT**

American Federation of State, County and Municipal Employees Michigan Council 25("AFSCME") and its affiliated Locals 207, 2394 and 2920 has filed papers with the court to lift the automatic stay for the purpose of allowing the Michigan Employment Relations Commission ("MERC") to hear AFSCME's Unfair Labor Practice Charge ("ULP") and Unit Clarification Petition ("UCP") against the City of Detroit ("City" or "Debtor").

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to lift the automatic stay, or if you want the court to consider your views on the motion, within fourteen (14) days, you or your attorney must:

1. File with the court a written response or an answer, explaining your position at:<sup>1</sup>

**United States Bankruptcy Court**  
211 West Fort Street  
Detroit, MI 48226

---

<sup>1</sup> Response or answer must comply with F. R. Civ. P. 8(b), (c) and (e)

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

You must also mail a copy to:

Richard G. Mack  
Ada A. Verloren  
Miller Cohen, P.L.C.  
600 West Lafayette Street  
Detroit, MI 48226  
(313) 964 4454 (Phone)  
(313) 964 4490 (Fax)

[richardmack@millercohen.com](mailto:richardmack@millercohen.com)  
[averloren@millercohen.com](mailto:averloren@millercohen.com)

Tere M. McKinney  
600 West Lafayette Street. Suite 500  
Detroit, MI 48226  
(313) 964 1711 (Phone)  
(313) 964 0230 (Fax)  
[tmckinney@miascme.org](mailto:tmckinney@miascme.org)

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the motion and you will be served with a notice of the date, time and location of the hearing.

**If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.**

Date: August 12, 2014 Signatures /s/ Richard G. Mack, Jr.

Name: Richard G. Mack, Jr.

Address: 600 W. Lafayette, 4<sup>th</sup> Fl., Detroit, MI 48226

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	
	)	Chapter 9
	)	
CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes
	)	
_____	)	

**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 12, 2014, the *Notice of Motion for Relief from the Automatic Stay & Opportunity to Object*, with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

/s/ Richard G. Mack, Jr.  
Richard G. Mack, Jr., Esq.  
MILLER COHEN PLC  
600 West Lafayette Boulevard, 4th Floor  
Detroit, MI 48226-3191  
Telephone: (313) 566-4787  
Facsimile: (313) 964-4490  
[richardmack@millercohen.com](mailto:richardmack@millercohen.com)

Dated: August 12, 2014